

Exhibit 1

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**STIPULATION REGARDING THE FIFTH JOINT MOTION OF THE DEBTORS
AND THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR
AN ORDER AUTHORIZING THE MOVANTS TO REDACT OR
WITHHOLD CERTAIN CONFIDENTIAL INFORMATION OF CUSTOMERS**

This stipulation (“Stipulation”) is being entered into between FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”), the Official Committee of Unsecured Creditors appointed in the above-captioned cases (the “Committee”), the United States Trustee for the District of Delaware (the “U.S. Trustee”), and Bloomberg L.P., Dow Jones & Company, Inc., The New York Times Company and The Financial Times Ltd (collectively, the “Media Intervenors” and, together with the Debtors, the Committee and the U.S. Trustee, the “Parties”).

WHEREAS, on November 23, 2023, the Court entered the *Interim Order (I) Authorizing the Debtors to Maintain a Consolidated List of Creditors in Lieu of Submitting a Separate Matrix for Each Debtor, (II) Authorizing the Debtors to Redact or Withhold Certain Confidential Information of Customers and Personal Information of Individuals on an Interim Basis and (III) Granting Certain Related Relief* [D.I. 157] (the “Interim Order”);

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

WHEREAS, on January 11, 2023, the Court entered the *Final Order (I) Authorizing the Debtors to Maintain a Consolidated List of Creditors in Lieu of Submitting a Separate Matrix for Each Debtor, (II) Authorizing the Debtors to Redact or Withhold Certain Confidential Information of Customers and Personal Information of Individuals on a Final Basis and (III) Granting Certain Related Relief* [D.I. 545] (the “Final Order”);

WHEREAS, on June 15, 2023, the Court entered the *Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers and Personal Information of Individuals* [D.I. 1643] (the “First Extension Order”);

WHEREAS, on June 23, 2023, the Media Intervenors filed a notice of appeal regarding the First Extension Order [D.I. 1690];

WHEREAS, on October 24, 2023, the Court entered the *Second Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers* [D.I. 3353] (the “Second Extension Order” and, together with the Interim Order, Final Order and First Extension Order, the “Prior Orders”);

WHEREAS, on each of January 11, 2023, June 8, 2023, June 9, 2023 and October 24, 2023 (collectively, the “Prior Hearings”), the Court held an evidentiary hearing during which the Debtors and/or the Committee, as applicable, presented evidence on which the Court relied to enter the Prior Orders;

WHEREAS, at the October 24, 2023 hearing, in connection with granting the Second Extension Order, the Court requested that the Parties find “some way to avoid another one of these hearings in 90 days where we don’t have to go through and hear the same testimony again” (Oct. 24, 2023 Hr’g Tr. 59:16-18);

WHEREAS, the Media Intervenors' appeal of the First Extension order is currently pending before the United States District Court for the District of Delaware, Civil Action No. 23-682-CFC (the "Appeal");

WHEREAS, on January 22, 2024, the Debtors filed the *Third Joint Motion of the Debtors and of the Official Committee of Unsecured Creditors for an Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers* [D.I. 6153], seeking entry of the *Third Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers* (the "Third Extension Order");

WHEREAS, the Parties engaged in good faith discussions to comply with the Court's directive and agreed to the *Stipulation Regarding the Third Joint Motion of the Debtors and the Official Committee of Unsecured Creditors for an Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers* [D.I. 7305] on the terms set forth therein;

WHEREAS, on February 13, 2024, the Court entered the Third Extension Order [D.I. 7315], which set the Extended Redaction Deadline of May 13, 2024;

WHEREAS, on May 13, 2024, the Debtors filed the *Fourth Joint Motion of the Debtors and of the Official Committee of Unsecured Creditors for an Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers* [D.I. 14727], seeking entry of the *Fourth Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers*;

WHEREAS, the Parties engaged in good faith discussions to comply with the Court's directive and agreed to the *Stipulation Regarding the Fourth Joint Motion of the Debtors and the Official Committee of Unsecured Creditors for an Order Authorizing the Movants to Redact or*

Withhold Certain Confidential Information of Customers [D.I. 16164] on the terms set forth therein;

WHEREAS, on August 28, 2024, the Debtors filed the *Fifth Joint Motion of the Debtors and of the Official Committee of Unsecured Creditors for an Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers* [D.I. 23986] (the “Fifth Extension Motion”), seeking entry of the *Fifth Order Authorizing the Movants to Redact or Withhold Certain Confidential Information of Customers* (the “Fifth Extension Order”);

WHEREAS, the U.S. Trustee and the Media Intervenors have advised they oppose the relief requested in the Fifth Extension Motion;

WHEREAS, it is the intention of the Parties to continue to comply with the Court’s directive without prejudice to any of the Parties’ rights, claims, arguments, and defenses in this matter and in the Appeal; and

WHEREAS, the Parties engaged further in good faith to comply with the Court’s directive;

NOW, THEREFORE, IT IS HEREBY STIPULATED by and among the undersigned counsel for the Parties as follows:

1. To avoid the need for an additional evidentiary hearing, and in light of the Court’s directive to the Parties at the October 24, 2023 hearing, the Parties agree that the Court may rule on the Fifth Extension Motion based on the existing record of the Prior Hearings and the pleadings filed to date.

2. All Parties’ rights are reserved in the event that the Court declines to enter the Fifth Extension Order based on the existing record of the Prior Hearings, including specifically the Debtors’ and the Committee’s right to offer witness testimony and other evidence in support of

the Fourth Extension Motion, and the U.S. Trustee's and the Media Intervenors' right to contest such evidence and offer argument opposing such an extension.

3. All Parties' rights are reserved in the event that the Court enters the Fifth Extension Order based on the existing record of the Prior Hearings, including (i) the Media Intervenors' rights and arguments with respect to their Appeal and (ii) rights and arguments of the U.S. Trustee and Media Intervenors with respect to (a) *The Celsius Litigation Administrator's Motion for Entry of an Order for Authority to File Under Seal the Transfer Schedules Containing Confidential Information* [D.I. 17182], (b) *United States Trustee's Objection to and Reservation of Rights with Respect to the Celsius Litigation Administrator's Motion for Entry of an Order for Authority to File Under Seal the Transfer Schedules Containing Confidential Information* [D.I. 24215], and (c) *Media Intervenors' Objections to the Celsius Administrator's Motion for Entry of an Order for Authority to File Under Seal the Transfer Schedules Containing Confidential Information* [D.I. 17830].

4. All Parties' rights, claims and defenses with respect to any requests for further extensions of the redaction deadline are reserved.

5. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Fifth Extension Motion, except for those matters, claims, rights, or disputes for which the United States District Court for the District of Delaware currently has jurisdiction pursuant to Media Intervenors' Appeal.

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September 11, 2024

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